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August 29, 2025

Via Electronic Filing

The Honorable Jennifer P. Wilson
U.S. District Court for the Middle District
Sylvia H. Rambo United States Courthouse
1501 North 6th Street
Harrisburg, PA 17102

RE: Wen Vaughn v. PrimeCare, et al
Civil Action No.: 1:25-cv-00797-JPW

Dear Judge Wilson:

Per the Court's Case Management Conference Scheduling Order (ECF 11) entered on July 8, 2025, a Rule 16 Conference is scheduled on September 10, 2025. Since that time, Plaintiff's counsel has been attempting to make service on the Dauphin County Defendants through its counsel, Frank Lavery, Jr., Esq. On May 6, 2025, counsel sent the Complaint and Waiver of Service of Summons via email. After not receiving a response, counsel followed up on August 28, 2025, via email.

It has only recently has come to the attention of counsel that Mr. Lavery has been out of the office on a medical leave. Yesterday, undersigned counsel reached out to Andrew W. Norfleet, Esq. of the Lavery Law firm and he has advised that he will forward the information to the County

Counsel for the Plaintiff and the PrimeCare defendants, John R. Ninosky, Esq have conferred and believe it is in the best interest of all parties, as well as, for judicial economy to continue the Case Management Conference until the Dauphin County Defendants have been served and counsel enters their appearance. Therefore, counsel are making a joint request to reschedule the Case Management Hearing on September 10, 2025.

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If your Honor has any questions, please feel free to contact me. I thank you for your consideration of this matter.

Very truly yours,

Alan E. Denenberg

Alan E. Denenberg, Esquire

AED/ll

CC: John R. Ninosky, Esq.

Andrew W. Norfleet, Esq.